

# **PRIVACY POLICY**

**VERSION 4.0**

**15/03/2024**

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# 1. INITIAL CONSIDERATIONS

## 1.1. About the Privacy Policy

At EloGroup, we recognise the importance of protecting your personal information and we are committed to processing it securely, following the best Information Security practices and in compliance with the Brazilian General Data Protection Law (LGPD, n. 13,709/2018).

Your personal data is very important and that is why we endeavour to treat your information securely and transparently. It is our duty to keep your data safe and to guarantee its confidentiality and integrity while it is with us. When you share your personal data with us, rest assured that we will only use it for the purposes specified at the time of collection.

**It is very important that you know:** We only collect the data we need to fulfil our purposes. We reserve the right, if necessary or if required by tax, judicial or administrative authorities, to provide data to fulfil legal and/or regulatory obligations.

## 1.2. Brazilian General Data Protection Law (LGPD)

The Brazilian General Data Protection Law (LGPD) – also known as Law n. 13,709/2018 – created rules for the protection of people’s personal data in Brazil, both in digital and physical media, aiming to guarantee the holders’ fundamental rights to freedom and privacy. It also establishes hypotheses for the processing of personal data to be considered legitimate.

The LGPD established the Brazilian Data Protection Authority (Autoridade Nacional de Proteção de Dados – ANPD), to regulate all data processing activities in the country. It has the power to supervise companies and receive complaints from data subjects.

## 1.3. Personal Data Treatment

Personal data is information that can identify you directly or indirectly, like your name, social security number, e-mail address, telephone number, IP, website browsing history, geolocation and diversity data, among others.

“Processing of personal data” is considered to be all the actions that can be carried out with information. Such as: collecting, accessing, updating, storing, archiving, reproducing, evaluating, classifying, extracting, communicating, sharing, transferring and eliminating.

In one hand, the owner of all personal data is you, the holder of your own personal information. The LGPD has empowered citizens to control their data, strengthening the exercise of freedom of expression, access to information and the rights to privacy, honour and image.

On the other hand, data processing agents can be understood as natural or legal persons (companies) who collect, use, share or carry out any other activity with personal data for economic purposes. They must act as the custodians of personal data in their environments and, thus, have a duty to carry out processing activities following the purposes set out in the LGPD.

There are two categories of processing agents, and EloGroup may fall into both cases, depending on how your data is received and processed: Existem duas categorias de agentes de tratamento, podendo a EloGroup se enquadrar em ambos os casos a depender de como seu dado é recebido e tratado:

- Controller: handles making the decisions on how personal data will be processed, as well as defining its purpose; or
- Operator: a person or company hired, for commercial purposes, by the Controller to perform a service at his request. They will process the data following the Controller’s instructions and always by the law

The 6th Article of the LGPD establishes the observance of good faith and the following principles on data processing activities:

- I. PURPOSE: The processing is carried out for legitimate, specific and explicit purposes that have been informed to the data subject, without the possibility of further processing that is incompatible with those purposes;

- II. **ADEQUACY:** Compatibility of the processing with the purposes informed to the data subject, according to the context of the processing;
- III. **NECESSITY:** Limitation of the processing to the minimum necessary for the fulfilment of its purposes, covering data that is relevant, proportionate and not excessive in relation to the purposes of the data processing;
- IV. **FREE ACCESS:** Guarantee to data subjects of free and easy consultation on the form and duration of processing, as well as on the completeness of their personal data;
- V. **QUALITY:** guarantee to data subjects that their data is correct, clear, relevant and up to date, by the need for it and for the fulfilment of the purpose for which it is processed;
- VI. **TRANSPARENCY:** guaranteeing data subjects clear, precise and easily accessible information about the processing and the respective processing agents, with due regard for commercial and industrial secrets;
- VII. **SECURITY:** Use of technical and administrative measures to protect personal data from unauthorised access and accidental or unlawful destruction, loss, alteration, communication or dissemination;
- VIII. **PREVENTION:** Adoption of measures to prevent the occurrence of damage because of the processing of personal data;
- IX. **NON-DISCRIMINATION:** The impossibility of processing for unlawful or abusive discriminatory purposes;
- X. **RESPONSIBILITY AND ACCOUNTABILITY:** Demonstration by the agent of the adoption of effective measures capable of proving compliance with personal data protection rules, including the effectiveness of these measures.

## 1.4. Application

This Policy applies to all EloGroupers, former EloGroupers, potential EloGroupers, customers, suppliers, business contacts, partners, visitors, as well as to all communication channels made available by EloGroup through printed content, product delivery, websites, apps, events, interfaces, portals, products and Internet applications, among others, whether physical or digital, which display and link to this Privacy Policy.

## 2. WHICH DATA WE COLLECT

### 2.1. Data

For you to take advantage of all our content and newsletters, the first step is to register on the EloGroup website. During this process, we ask you to provide us with your full name and e-mail address. Occasionally, so that we can segment the content we send you, we may ask other information, like your city, state, profession or job title and the company where you work.

If you interact with EloGroup in other ways, like by taking part in events and in recruitment selection process, registering as a supplier, contracting services or joining the company as an EloGrouper, we may collect other types of data, as described in the table below:

| TYPE OF INFORMATION                               | DESCRIPTION  |
|---|--|
| Register personal and contact details             | EloGroup may collect personal data for recruitment purposes, such as identity number, social security number, full address, marital status, dependents and emergency contacts.   |
| Academic, professional and background information | EloGroup may collect information about your educational background, earlier employment and, when applicable and authorised by law, credit standing history, criminal record or other information available during background checks. |
| Financial information for payment and benefits    | Your bank details and other financial details are needed for payment and benefit payments.   |
| Information submitted by you for hiring purposes  | Information submitted by you in CVs, letters or any other printed material   |



|   |  |
|---|--|
| Recruitment information from third parties      | Information about you obtained from third-party job placement companies or job search websites, when applicable  |
| Talent management information                   | Information generated during the selection process, based on EloGroup recruiters' interactions with you. Results of performance analyses, tests, performance feedback and warnings.  |
| Diversity information                           | Information on race, gender, ethnicity, physical disabilities and self-designation of LGBTQUIAP+ status for the purposes of government evidence when required by law and for EloGroup's diversity analysis, subject to legal limitations and authorised by the user. |
| Project Allocation Register                     | Information regarding EloGrouper's allocation history in its projects, whether internal or with clients  |
| Information from Social Listening               | Information from searches on websites and social networks (only what is publicly accessible) through keywords, hashtags and direct mentions (tagging) of any profile managed by EloGroup on social media.  |
| Audiovisual Materials and Participation Records | Photographs, images, audio and video recordings taken at events, whether face-to-face or virtual, and a record of participation (log with date and time) when held via videoconference.  |

Table 1: Data collected.

In addition to processing the data following this Policy, we also collect and process your data in an anonymised form, i.e. in such a way that you are not personally identifiable.

## **2.2. Navigation Data**

We collect your Data when you access our website, fill in forms, make comments, take part in events, promotions, polls, sweepstakes, searches and other interactions on our communication channels, accessing them via your computer, mobile phone and/or other access device.

The data collected from your access includes approximate location (latitude and longitude); IP address; information about your access device (like unit identifier, advertising identifier, name and operating system type); internet connection information; browser type and the pages and content you access on our communication channels. A security breach only becomes a data breach when it involves the loss of personal data or unlawful processing of personal data.

## **2.3. Data received by clientes and/or third parties**

We formally ask that clients send us their data using anonymisation or pseudonymisation techniques (using hashing, scrambling or masking), ensuring that no person can be identified or deduced from the application of any of these. The controller must also formally declare that it has consent to process and share the respective data with third parties, seeing the respective purpose of use or the Legitimate Interest of the controller. Client specifics must be dealt with by the Director responsible for the account and the Compliance and Information Security team. All data received from clients is used only for the purposes of the project and interaction with them. At the end of each project, the data used is disposed of.

All projects or initiatives contracted from suppliers or developed by EloGroup follow specific data protection and information security practices and all our EloGroupers only work undersigned confidentiality agreements. Client data and documents cannot be saved on machines and must be handled in a secure environment defined by EloGroup's

IS team or in an environment indicated by the client. EloGroup follows the respective privacy policies of the clients in which it acts as data operator.

## 3. HOW WE UTILIZE YOUR DATA

### 3.1. Data Usage

Excluding cases of contractual requirements or those required by law, your decision to provide personal data is entirely voluntary and you will not suffer any negative consequences if you do not wish to provide it. It is of the utmost importance to understand that if some information is not provided, we may not be able to achieve some of the purposes listed below, and you may not be able to use some tools, benefits or systems that require such data.

We use your Data to:

- Communicate with us and provide content to you
- Confirm and complete your Data, by the relationship established with you
- Respond when you contact EloGroup, in accordance with the relationship established with you
- Comply with the requirements of events, recruitment actions or competitions, if you have agreed to take part in such events, recruitment actions or competitions offered by EloGroup
- Stages of the selection and hiring process
- Communicate about events, recruitment actions or competitions conducted by us and/or by partner companies in agreement with EloGroup, in your email account, by text message, messaging application, telephone call and push notification
- Manage our contractual and/or employment relationship
- Perform administrative functions
- Administer EloGrouper benefits
- Provide security and protect rights

- Preventing illegal, fraudulent or suspicious activities that may cause damage to EloGroup or third parties;
- Preventing technical or security problems;
- Protecting our rights and property, including from intrusions and hacking; and
- Protecting the property rights of third parties who use our communication channels.
- Inform you about changes to our terms, services or policies (including this Policy)
- Personalise your experience
- Select and personalise content for you, inside or outside our communication channels;
- Customise the content we show you on our channels;
- Make inferences about content and topics that may be of interest to you; and
- Identify and recommend content that may be of interest to you.
- Improve, analyse and develop new events and content
- Develop, evaluate performance, test, improve or generate new content;
- Carry out research, analysis and innovation activities related to the performance and improvement of our channels and content;
- Understand the profiles of people who access our content;
- Monitor activities and usage trends; and
- Measure interactions and audience of channels and content.
- Complying with our legal and regulatory obligations
- Complying with legal, judicial and administrative orders and requests from competent authorities; and
- Taking or provoking legal, judicial and administrative measures to defend our rights and the rights of third parties, including in any judicial or administrative proceedings.
- Promoting social welfare
- Carrying out, supporting and encouraging research, social projects and initiatives related to general social welfare, citizenship, health, education and culture.

We will not use your data for any purposes that are not compatible with those informed and previously authorised by you, unless needed or allowed by law, or unless it is in your vital interest to do so. When your data is no longer needed, it will be de-characterised or completely cut from our database.

### **3.2. Which EloGroup's companies are going to have access to your data**

The companies that make up EloGroup share infrastructure, systems and technology. As such, your data may be processed by the EloGroup companies listed below:

- EloGroup Desenvolvimento e Consultoria Ltda.
- EloGroup Consulting Ltda.
- EloGroup

## **4. HOW YOU CAN MANAGE YOUR DATA**

EloGroup is committed to ensuring that you exercise your rights. If you have any questions about your Data, please contact us at [sgsi@elogroup.com.br](mailto:sgsi@elogroup.com.br). Your rights can be exercised as guaranteed by the LGPD in the following ways, when applicable:

- CONFIRM the existence of data processing;
- REQUEST access to your personal data;
- CORRECT incorrect or outdated personal data;
- BLOCK or DELETE data considered unnecessary or excessive;
- PORTALISE your data to other suppliers;
- DELETE your personal data when there is no other law limiting the action (some laws and regulations in force may prevent the immediate deletion of your data, requiring compliance with the retention established by them. Consult us to find out more);
- UNDERSTAND if your data is shared with other organisations or third parties;
- ANONYMISE your personal data when possible;
- REVOKE consent previously granted; and

- COMPLAIN with the National Data Protection Authority if you identify that a processing is unlawful.

After deletion or revocation of consent to use data, EloGroup may keep your data only for the period necessary for the purposes of judicial, administrative and arbitration proceedings, for compliance with a legal and/or regulatory obligation, for the regular exercise of rights, such as enforcing EloGroup's rights. You may request information on which data will still be kept for these purposes.

We will endeavour to respond to all requests within the timeframe established by the LGPD and when this is not possible or there is a valid reason for not doing so, you will be duly notified.

## **5. WHO WE SHARE YOUR DATA WITH**

### **5.1. Data sharing**

EloGroup uses reliable third-party services and technologies that follow acceptable security standards and are subject to confidentiality obligations. Your Data may be shared with the categories of third parties (listed below) always by this Policy, the Terms of Use of the respective Service (if any) and the applicable legislation and for the purposes established.

EloGroup does not sell, trade or rent personal information that it holds. We may use generic information about the profile of our visitors, without exposing any personal information, thus, safeguarding the identity of our users with our business partners.

### **5.2. Research Companies**

To offer content more suited to your profile, we and/or our research partners will contact you to carry out polls and surveys to test, solve problems or evaluate our performance.

### **5.3. Technology Infrastructure Service Providers**

To provide cloud services that meet our organisational needs; host our content; and provide technical and operational support, in these circumstances your data may be stored and processed on third-party platforms, which may be in Brazil or abroad.

### **5.4. Technical Support Service Providers**

For third parties to provide us with technical support services and aid to our employees. In these circumstances, your data may be processed by third parties. Any support service provided is only authorised to carry out activities and have access to third party data with a signed confidentiality agreement.

### **5.5. Marketing Services Providers**

To comply with legal, judicial and administrative orders, to fulfil requests from competent authorities and to take or provoke legal, judicial and administrative measures to defend the rights of EloGroup and its employees. Government Authorities means police authorities, public entities and/or other public organisations.

### **5.6. Security and Fraud Prevention Entities**

To fulfil a contractual obligation; enforce the terms and conditions of this Policy and/or the Terms of Use and/or subscription agreements to which you have agreed; prevent illegal, fraudulent or suspicious activity; prevent technical or security problems; and report violations and/or protect our rights and property.

### **5.7. Financial and Benefit Service Providers**

To carry out any type of financial transaction for suppliers, customers and EloGroupers, your bank details may be shared with our financial providers. We may also share EloGroupers' data to provide benefits.

## 6. COOKIES

### 6.1. Definition of Cookies

Cookies are small text files that are sent to and stored on your device, such as a computer, smartphone or tablet, when you access a website. These small files serve to recognise, track and store your browsing experience as a user on the Internet. The use of cookies by EloGroup is necessary to provide the user of our website with a good and secure experience.

### 6.2. What cookies are for

The use of cookies to track and store information will enable EloGroup to offer more personalised content, according to the characteristics and interests of its users, even making it possible to offer specific content for each person, benefiting the user experience on the Internet.

In general, cookies are used to:

- Provide differentiated content, remembering who you are and what your browsing habits are, as well as accessing information from your EloGroup registration;
- Track the progress and interest of users in our published content;
- Understand browsing patterns, mapping which areas you have visited and your visiting habits. We use this information to check our users' browsing routines and thus offer increasingly personalised content; and
- Facilitate and speed up form filling by pre-filling them with the user's information.

Below are the categories of cookies we use at EloGroup:



| USE<br>CATEGORY | DESCRIPTION   |
|-----------------|---|
| Performance     | Collect information anonymously and make it possible to determine information such as the number of visitors to a page, how visitors arrived at the site and the pages accessed.  |
| Functionality   | <p>Cookies in this category allow EloGroup to remember information about user behaviour and preferences.</p> <p>The loss of information stored in a preference cookie may make the website experience less functional, but it does not prevent it from working.</p> |

Table 2: Cookies Categories

### 6.3. Essential Cookies

These are necessary to ensure navigation and use of the site's existing resources. They can be categorised as:

- Temporary: These are session cookies. They are temporary and expire when you close your browser. Their purpose is to allow you to control the language and security during the session.
- Persistent: These are cookies that remain on the user's hard drive until they expire or are deleted by the browser. Their purpose is to store user information such as for example, awareness of the use of cookies on this site.

### 6.4. Use of Third-Party Cookies

Technology service providers may use their own cookies on the Services, with our authorisation, to provide services to EloGroup, such as analytical systems. These cookies will collect your Data on our properties for the purposes set out in this policy.

They are intended to collect information on how the USER uses the website, such as the pages visited, and the links clicked. None of this information can be used to identify you. Its sole purpose is to enable analyses and improve the functions of the site.

### 6.5. Cookies Used at EloGroup

The following table holds information on the cookies used on EloGroup pages.

| COOKIE | DOMAIN          | DESCRIPTION  | DURATION | TYPE      |
|--------|-----------------|--|----------|-----------|
| _ga.   | elogroup.com.br | The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and tracks website usage for the analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.                | 2 years  | Analytics |
| _gid   | elogroup.com.br | Installed by Google Analytics, the _gid cookie stores information about how visitors use a site, as well as creating a report analysing the site's performance. Some of the data collected includes the number of visitors, their source and the pages they visit anonymously. | 1 day    | Analytics |

|                      |                  |   |          |             |
|----------------------|------------------|---|----------|-------------|
| _gat                 | elogroup.com.br  | This cookie is installed by Google Universal Analytics to restrict the request rate and thus limit data collection on high-traffic sites. | 1 minute | Performance |
| UserMatchHistory     | .linkedin.com    | LinkedIn sets this cookie to synchronise LinkedIn Ads IDs.  | 1 month  | Functional  |
| AnalyticsSyncHistory | .linkedin.com    | LinkedIn sets this cookie to store information about the time a synchronisation with the lms_analytics cookie took place.                 | 1 month  | Analytics   |
| lang.                | ads.linkedin.com | LinkedIn sets this cookie to remember a user's language setting.  | Session  | Functional  |
| bcookie              | .linkedin.com    | LinkedIn sets this cookie for LinkedIn share buttons and ad tags to recognise the browser ID.   | 1 year   | Functional  |
| lidc                 | .linkedin.com    | LinkedIn sets the lidc cookie to ease data centre selection.  | 1 day    | Functional  |
| In_or                | elogroup.com.br  | No description  | 1day     | Others      |

|           |                  |   |                      |             |
|-----------|------------------|---|----------------------|-------------|
| lang.     | linkedin.com     | LinkedIn sets this cookie to remember a user's language setting.  | Session              | Functional  |
| bscookie  | www.linkedin.com | LinkedIn sets this cookie to store actions taken on the site.   | 1 year               | Functional  |
| li_gc     | linkedin.com     | LinkedIn has set this cookie to store the visitor's consent to the use of cookies for non-essential purposes.                                 | 5 months and 27 days | Functional  |
| _fbp      | elogroup.com.br  | This cookie is set by Facebook to display adverts on Facebook or on a digital platform with Facebook advertising after you visit the website. | 3 months             | Advertising |
| Elementor | elogroup.com.br  | This cookie is used by the site's WordPress theme. It allows the site owner to implement or change the site's content in real time.           | Never                | Necessary   |

Table 3: Cookies utilised at EloGroup.

The cookies collected may be updated as plugins are updated, or the site is changed. You will be notified by a notice on the website or by a change to this policy if new cookies are needed.

## 6.6. How to change or block cookies

Some browsers have the setting to automatically accept cookies from a website. You can, however, change the settings to block cookies or alert you when a cookie is being sent to your device. There are several ways to manage cookies, including creating a general cookie block, blocking cookies from a specific website and even blocking third-party cookies in relation to a website. Blocking all cookies will affect how your experience works, as it will not be possible to identify your preferences and recommend relevant content and advertising.

Consult your browser's instructions to find out more about how to adjust or change your settings, according to the following links with instructions for the main browsers. Remember that the desired configuration must be replicated on all devices used to access the Content (such as computers, smartphones, tablets) and disabling them may affect the functioning of our site.

- [Chrome](#)
- [Edge](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Safari](#)

## 7. DATA STORAGE, PROCESSING AND TRANSFER

You consent that your Data may be transferred, stored and processed in Brazil or abroad by EloGroup or its Partners in accordance with this Policy. Wherever your Data is transferred, stored or processed by us or our partners, please be aware that we will take technical and organisational security and confidentiality measures and safeguards to ensure an adequate level of Data protection.

## 8. HOW WE KEEP YOUR DATA SECURE

EloGroup implements security controls to protect your Data. We adopt practices in line with technical and regulatory market standards for Data security and privacy, with actions in technology and organisational processes. Our measures to protect your Data from unauthorised access, use, alteration, disclosure or destruction include the physical and logical protection of assets, encrypted communications, access management, adherence to secure software development and internal compliance policies that embed security in the life cycle of our services. All these controls are constantly reviewed to keep up with and react to new threats on the Internet.

Our website uses advanced security technology. All data traffic is encrypted, which is a standard method used on the Internet to protect communications between web users and websites, providing secure browsing.

We limit access to personal information to EloGroup employees, partners, contractors and agents who need to know that information to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to penalties, including termination of contract and criminal prosecution, if they fail to follow these obligations. EloGroup never registers any user without their permission.

We are in the process of ISO 27001 certification, which indicates adherence to the best practices in Information Security Management, with international recognition that we will comply with the highest and strictest information security standards.



## 9. DATA CONTROLLER (DPO)

In view of the need to appoint a Data Controller for personal data processing activities (Article 41 of the Brazilian General Data Protection Law). The Data Controller at EloGroup handles ensuring compliance with the LGPD, guaranteeing that the processing of personal data is always carried out properly, as well as being the communication channel between the Controller, the Data Subjects and the ANPD.

The Data Controller appointed by EloGroup is João Chagas, who will answer any questions relating to the provisions contained in this Policy through the contact channel by e-mail: [sgsi@elogroup.com.br](mailto:sgsi@elogroup.com.br). If you do not wish to identify yourself, you can send a message via our complaints channel.

## 10. POLICY ALTERATIONS AND UPDATES

We are always improving our Policy and the changes will be reflected on this page. So, before you access our content, look here. When we publish changes to the Policy, we will update the date on which the last change was published.

Remember: By continuing to access our content after these changes take effect, you agree to be bound by the latest version of the Policy.

If you have any doubts or questions about our Policy or the processing of your Data by EloGroup, please contact us at [sgsi@elogroup.com.br](mailto:sgsi@elogroup.com.br).

This Policy is part of an organisational initiative, an ongoing process to protect and use your information in the safest and most ethical way. Please share your suggestions with us.

4th version – revised, approved and updated.

March 2024.

### *Versions*

| <b>VERSÃO</b> | <b>DATA</b> | <b>DESCRIÇÃO</b>                 |
|---------------|-------------|----------------------------------|
| 1.0           | 27/09/2021  | Initial version of the document. |
| 2.0           | 29/03/2022  | Updated and revised version.     |
| 3.0           | 01/06/2023  | Updated and revised version.     |
| 4.0           | 19/03/2024  | Updated and revised version.     |